

**WILTSHIRE and SWINDON Proposed Submission  
Draft WASTE SITE ALLOCATIONS  
DEVELOPMENT PLAN (DPD)**

**An Objection from**

**CHITTERNE PARISH COUNCIL**

**August 2011**

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**1.0 Introduction:** This objection to the inclusion in the Wiltshire and Swindon Proposed Submission Draft Waste Site Allocations Development Plan of the Chitterne Waste Management Facility is drafted by Chitterne Parish Council, following consultation with the villagers of Chitterne. The relevant minute reference concerning the position of Chitterne Parish Council on any further development of the Chitterne Waste Management Facility site is as follows - **300/54, meeting held on 11<sup>th</sup> July 2011.**

1.1 Chitterne Parish Council's objections to the Waste Local Plan are outlined in this report and are founded, in the main, on evidence in reports commissioned by Wiltshire Council itself in pursuance of the development plans, which clearly demonstrate the unique unsuitability of Chitterne as a site for local household waste transfer, processing and/or disposal. This evidence has either been overlooked, ignored or misrepresented in the current development plan. Several Chitterne residents have addressed specific aspects of the proposal in separate submissions to the Planning Inspector, these responses should be considered in conjunction with these Parish Council observations. I refer particularly to the submissions of D. Robinson, A. Hutchinson and J Smedley.

1.2 Concern that the proposals presented in the present report are unsound, since they are based on flawed evidence, or ignore evidence which casts doubt on the issues of traffic safety, landscape and visual amenity, bio - and geo-diversity, historic environment and cultural heritage, human health and amenity and the water environment. Further, we shall draw attention to inaccuracies within the data presented, which, while they do not, in themselves, invalidate the proposals, do cast significant doubts on the integrity of the process followed thus far.

1.3 The landfill site at some point has been renamed the the 'Chitterne Waste Management Facility' – this is misleading and implies that a great deal more waste processes are/could, being/be carried out at the site, see quote below. The site is in fact only an inert landfill site as it is an agricultural improvement scheme to make farming of a steep sided valley safer (letter from Planning Inspectorate ref: T/APP/F3925/A/90/160383/P6 07 March 1991).

The site under question is **not** currently part of the 'waste management facility'. It is a large greenfield site (grade 3 agricultural) adjacent to the landfill.

An example of how the site has been misrepresented appears as 4.18 p 21 '**The allocation at Chitterne, whilst removed from any concentrations of population represents a suitable opportunity to maximise the efficient use of an existing and long term resource and waste management facility.....**' It should again be pointed out that, **..' the existing and long term resource'** is in fact an agricultural improvement scheme, that is using chalk, sub-soil and top-soil to fill in a valley to improve farm safety.

## 2.0 DETAILED RESPONSE

### 2.1 Traffic and Transportation

2.1.1 Chitterne Residents and the Parish Council have for over ten years been deeply concerned by the level of heavy traffic and the speed at which vehicles travel through the village. The village has a number of horses and riders that have to use the roads through the village to access the bridleways on the Plain. There are many children and young people who catch buses to the local schools and there is a large proportion of Senior Citizens, who use the Plain for exercise and dog-walking. The current weight and speed of traffic is intolerable and is eroding the quality of life for those living in Chitterne. The Police and Highways Authority have done little to address this issue, despite frequent representations by the Parish Council, the local councillor, M.P., individuals and groups living in the village. Access to the Chitterne inert Landfill site from the East is through the village and access from the West is from the A36. The junction at Knook Camp is a notorious Black Spot with a frightening accident rate<sup>1</sup>.

2.1.2 the Atkins Joint Waste Site Allocations Site Survey Report, May 2010 commissioned by Wiltshire Council states: **'The village of Chitterne is subject to an 18T weight restriction, meaning that all vehicles should only route via the A36 to access the site'** (*Joint Waste Site Allocations Site Survey Report, Atkins 2010 Appendix B p.646*) this is the baseline for selecting the site for further development. This is not enforceable according to Wiltshire police. The potential impact on the village of Chitterne as a result of increased lorry traffic, if the proposed development goes ahead, is totally unacceptable. The village is used as a rat run throughout the day and experiences a high volume of heavy and speeding traffic of all descriptions<sup>2</sup>.

2.1.3 There is no footway along the narrowest (approx 19') length of the B390. **'There is a 18T environmental weight restriction in the village of Chitterne, as well as on-street parking and narrow road widths (often less than 6 meters).** (*Joint Waste Site Allocations Site Survey Report, Atkins 2010 Appendix B p.644*). This is extremely hazardous for pedestrians, cyclists, horseriders etc. Many residential properties have their access directly onto the B390 where there is limited visibility.

2.1.4 Villagers of Chitterne are reluctant to walk down the road to access the Imber Range Path (which uses the B390 to the west end of the village) due to the speed of vehicles that use the road as a cut through to avoid congestion on the A303. Vehicles that exceed the 18T weight restriction use the B390, at speed, to access the inert landfill site at the Chitterne Waste Management Facility. If the proposed development at Valley Farm goes ahead the traffic levels will potentially increase by a huge percentage as illustrated in the Joint Waste Site Allocations Site Survey Report, Atkins May 2010 table B.4.9.6.1 P.643 - making use of the road even more dangerous to villagers<sup>3</sup>.

2.1.5 There is the major issue of community severance with many properties lying to the south of the B390, with village amenities including the recreation ground, three school bus stops, pub, church, footpaths and byways, located to the north of the road.

2.1.6 Overweight vehicles not only use the B390 to access the site but also use the undesignated road running through the village to the north, which links to the A360 north west of Tilshead. This is a very narrow road, densely populated and with a single width carriageway through the village of Chitterne at Townsend. If the proposed site development goes ahead then the effects on this area of Chitterne village must be taken into account, not just the B390<sup>4</sup>.

### *Footnotes to Section 2.*

<sup>1/2</sup>*The stretch of road from the lower entrance to Valley Farm through to Knook has also been the location of a number of traffic accidents over the last ten years, despite recent road improvements. Chitterne Parish Council has made a Freedom of Information request for statistics covering these accidents as well as statistics relating to the speeding offences recorded during a recent campaign of speed and vehicle weight monitoring through the 30mph limit in Chitterne village.*

<sup>3</sup>*At peak times during a Community Speed Watch check, traffic volumes exceeded more than 500 per hour. Any increase on these levels, given the inadequacy of the carriageway and the absence of pavements at key points, would render normal life in this part of the village almost impossible and extremely hazardous.*

<sup>4</sup>*Many of the dwellings located in the narrowest part of the road open directly on to the carriageway. Most are at least 100 years old, built on chalk with inadequate foundations to withstand damage from an increased level of heavy traffic.*

## **2. 2 Water Environment**

2.2.1 'The proposed development site is located on a major aquifer of high vulnerability. It is pointed out in the Atkins report that **'Given that the site lies on a principal aquifer and is close in proximity to a SPZ 1 for a public water supply source a high level of engineering containment will be required at this site to safeguard the groundwater environment.'** (p. 32 Wiltshire and Swindon Proposed Submission Draft Waste Site Allocations Development Plan Document)

2.2.2 The data and potential risks to the water environment directly relating to Chitterne Village are alarming. (Table B.4.9.7.1 Chitterne Waste Management Facility Water Environment Joint Waste Site Allocations Site Survey Report, Atkins 2010 Appendix B).

Contamination of drinking water supply is stated as a potential risk if the proposed uses of the site are pursued. This is totally unacceptable.

**'The risk of impact on the Chitterne Brook flow as a result of increases in areas of hardstanding and runoff volumes during construction and operation.'**

2.2.3 There are many houses in Chitterne Village located very close to Chitterne Brook. Any processes that could result in the increase in flood risk to these homes is unacceptable. All potential uses as identified in the Wiltshire and Swindon Proposed Submission Draft Waste Site Allocation Development Plan Document would increase the risk of flooding of homes in Chitterne<sup>1</sup>.

2.2.4 It is quite incredible that despite all the findings of the Atkins Report the summary of site findings relating to Chitterne concludes that... **'Few/no significant issues identified'**. This is interesting when one compares the Summary and Site Findings for Warminster Business Park, which states: **'Several potentially significant issues identified..'** This is despite the fact that the Chitterne site is underlain by a primary aquifer.

**The risk of contamination of drinking water has been identified, the risk of flooding along Chitterne Brook has been identified<sup>2</sup>.**

The Warminster Business Park site in fact has less significant issues than the Chitterne site but this has been ignored in the summing up of data in the Atkins report. The report is therefore unsound in its use of data to inform any subsequent decision making process.

#### *Footnote to section 2.2*

<sup>1</sup>*The Chitterne Brook is a winterbourne, rising in late autumn and often running until early spring. Many of the springs feeding it rise from beneath dwellings in Townsend, often causing flooding affecting those dwellings, rendering septic tanks inoperable and in severe cases, flooding the road. Any increase in flows from the proposed site will result in back-ups which could seriously inundate the lower stories of several houses. Any discharge to the brook during the dry summer months will not be diluted and will therefore have a disproportionate impact.*

<sup>2</sup>*A more detailed critique on the impact of the proposed development on the water environment, bio and geo-diversity of Chitterne and its immediate surroundings is contained within the separate submission to the proposal by Amanda Hutchinson of St Mary's Lodge, Chitterne Aug 3 2011.*

## **2.3 Landscape, Townscape and Visual**

2.3.1 'The site is not allocated within the adopted West Wiltshire District Local Plan and the emerging Wiltshire Core Strategy does not propose (sic) any designation in the area of the site.' (*Atkins – Joint Waste Site Allocations Site Survey Report Appendix B B.4.9.3 p.640*)

2.3.2 'The site is not local to any other settlements which makes it an unsuitable site for 'local recycling'.' There is little recognition of the closeness of the village of Chitterne to the proposed site<sup>1</sup>. The photographs contained within the Atkins report only show the proposed greenfield site from the location of the inert landfill. This does not indicate the scale of the site within the landscape nor the truly rural nature of the site or its placement within the surrounding rolling downland. The Atkins photographs seem to be being used to display the site in the most unflattering way ignoring the landscape setting completely, this is unacceptable and unhelpful. (See *photos attached as appendix 3 for a more accurate view of the site within its landscape setting.*) The proposed site is a large (15ha) GREENFIELD site, currently under pasture and is grade 3 agricultural land. The site is set in an area of open rolling chalk downland and is highly visible from the B390 from west and east. (Appendix 1)

2.3.3 The site has only become a 'waste site' as a result of the planning permission for an agricultural improvement scheme. It is currently used solely as a landfill site for the disposal of chalk and topsoil to inform the filling of the valley to 'make farming safer' (*Reference required*)

How can it follow that an agricultural improvement scheme can be used to promote the development and building of an industrial waste processing plant in such an open and beautiful landscape? The current agricultural improvement scheme will not have any long term visual impact as once the site is closed the land will be remodelled and grassed to fit in with the surrounding contours of the landscape. This will not be the case if the proposed uses of the site are given the go ahead. The processes of Materials Recovery/Waste Transfer, Local recycling, Composting and Waste Treatment will all need building and structures to contain the processes. This will have a major visual impact on the surrounding countryside. **'Potential for landscape and visual impacts on the surrounding area due to the highly visible site location'** (*Wiltshire and Swindon Proposed Submission Draft Waste Site Allocations Development Plan Document p. 32*)

2.3.4 'This is a c.15 hectare Greenfield site in an open, rural location that is designated as a Special Landscape Area. Its use for waste facilities would therefore contribute to the erosion of the countryside.' (*Joint Waste Site Allocations Site Survey Report Atkins, 2010 Appendix B table B.4.9.1 P.632*)  
The landscape quality and condition of site is described as HIGH by Atkins.

2.3.5 The site is described in the Wiltshire Landscape Character Assessment (Wiltshire County Council) as:

*Landscape Type: High Chalk Plain*

*Landscape Character Area: Salisbury Plain East*

Key characteristics relevant to the site:

Very large scale and open, exposed landscape

Rolling plateau land form with panoramic views over the surrounding lowlands creating a sense of elevation

2.3.6 It is stated that 'The overall management strategy is to conserve the open and isolated character of the plain along with the vast area of calcareous grass land and sites of historic interest'. (*Joint Waste Site Allocations Site Survey Report, Atkins 2010 Appendix B table B.4.9.3 P.639*).

**The further development of the Chitterne Waste Management Facility is in conflict with this statement.**

## **2.4 Historic Environment and Cultural Heritage**

2.4.1 The proposed site is located within the proximity to a number of designations these include a number of scheduled ancient monuments in the area. The site is located in the vicinity Cranborne Chase AONB and the Salisbury Plain SPA, SAC and SSSI. The site is located within a South West strategic nature area and designated a Special Landscape Area (SLA). (*Joint Waste Site Allocations Site Survey Report, Atkins 2010 Appendix B table B.4.9.1 P.632*)

2.4.2 The Greenfield site that is proposed for development of waste management facilities contains an 'extensive and undated field system which is likely to be associated with elements of the surrounding prehistoric to Roman period landscape.' (*Joint Waste Site Allocations Site Survey Report, Atkins 2010 Appendix B table B.4.9.2 P.633*)

It is highly likely that this field system is connected to the surrounding scheduled ancient monuments and forms part of the wider archaeological landscape. As such the field systems should be viewed as an integral part of the historic landscape, not isolated features.

**'The overall management strategy is to conserve the open and isolated character of the plain along with the vast area of calcareous grass land and sites of historic interest'. (*Joint Waste Site Allocations Site Survey Report Atkins, 2010 Appendix B table B.4.9.3 P.639*).**

**'Improvements to the Chitterne Waste Management Facility would involve and have the potential to impact on the heritage resource of the site and surrounding area.'** (*Joint Waste Site Allocations Site Survey Report Atkins 2010 Appendix B p.633*).

## **2.5 Bio-diversity and Other Ecological Impacts**

2.5.1 In an appraisal of the Valley Farm Waste Management Facility conducted by Wiltshire Council in October 2009, it was stated that: *'The Salisbury Plain SPA is approximately 1.3 km north of the site and a key interest feature of the site is the Stone Curlew. The HRA assessment identifies that significant adverse impacts for this species are most likely to arise from disturbance, noise and light in proximity to nesting and feeding sites.... Some protected species have also been recorded in proximity to the site'* (These include a large badger population, sand lizards and several rare species of butterflies and moths).

2.5.2 The same report goes on to state that: *'Site is Greenfield and there are a number of priority habitats within 2.5 km of the site. Ecological survey required'* and: *'Site is identified as an area of potential Chalk Downland in the Southwest Nature map. Development of this area would lead to loss of part of this designation'*.

2.5.3 Given that it is widely believed that calcareous wild chalk downlands are disappearing at a faster rate than the Amazon rain forest, **it is scarcely credible that the Wiltshire Council can seriously consider putting at risk such a fragile part of our environmental and cultural heritage, when other, suitable sites with less potential for serious damage exist within a relatively short distance.**

## **3.0 Conclusion**

3.1 In summary, drawing from the evidence gathered and presented by Wiltshire Council, or by their expert consultants commissioned to examine the feasibility and advisability of including the Greenfield site at Chitterne in a list of locations suitable for the development of, Local Waste Recycling, Materials Recovery Facility, Waste Transfer Station, Waste Treatment and Composting, Chitterne Parish Council submit that;

- ⤴ **Agricultural Improvement Scheme** - The Chitterne Waste Management Facility is an agricultural improvement scheme. Inert chalk and topsoil are being used to fill in a valley in order to reduce the steep sides to make farming safer. It should not be assumed that the adjacent Greenfield site is therefore suitable for other waste management processes. The name of the site is misleading and predisposes the site for additional uses for which it is highly unsuitable.
- ⤴ **Transport and Traffic.** The existing access roads are inadequate and dangerous to village road users under the present circumstances. Any development which increases the traffic through the village will only exacerbate the situation.
- ⤴ **Water environment.** The risk of contamination of drinking water has been identified, the risk of flooding along Chitterne Brook has been identified.
- ⤴ **Landscape, Townscape and Visual Amenity.** 'This is a Greenfield site in an open, rural location that is designated as a Special Landscape Area. Its use for waste facilities would therefore contribute to the erosion of the countryside.'  
(Atkins – Joint Waste Site Allocations Site Survey Report Appendix B table B.4.9.1 P.632).

- ⤴ **Historic Environment and Cultural Heritage.** Major archaeological and historic sites identified by the Wiltshire Council and other national authorities surround the site. The site forms an associated link between two scheduled ancient monuments. Any damage to this will result in a loss to the archaeological landscape as a whole.
- ⤴ **Bio-diversity and Other Ecological Impacts.** What is known is that a number of rare and valuable flora and fauna rely on the unspoiled nature of this unique part of Salisbury Plain. The effect on these species and their habitat of the proposed development is unknown, but likely to be adverse.
- ⤴ **Misuse of Information.** Despite all the major issues associated with the site that are highlighted in the Atkins report, Wiltshire Council in its summary (p.32 Wiltshire and Swindon Proposed Submission Draft Waste Site Allocations Development Plan Document.) conclude that; **‘No cumulative effects identified at the plan-making stage.’**
- ⤴ **The 'Consultation' process.**  
Finally, we wish to protest strongly at the wholly inadequate process and quality of consultation followed by the Wiltshire Council. While we fully acknowledge the importance of developing a County-wide Waste Management strategy, we are unable to find any record of consultation with Chitterne Parish Council on the development of the current proposal since 2003. We have checked with a number of other Parish Councils affected by the plans and find they have a similar experience. While recognising Wiltshire Council's role in the development of a strategy, they must also recognise and respond to the role of Parish Councils in protecting the interests of their communities.

Taking into account all the above, Chitterne Parish Council have clearly demonstrated that;

**The proposed development of a Local Recycling Centre, Inert Waste/Transfer, Treatment, Materials Recovery Facility, Waste Transfer Station and Composting is entirely unsuitable for a Greenfield site in a highly visible rural location. Accessed by unsuitable roads with major concerns being raised relating to landscape effect, traffic, water safety and flooding and urge that the site be removed from any further consideration for the development of any additional waste management processes and as such, the site must be deselected from the Wiltshire and Swindon Draft Waste Site Allocations Development Plan Document (DPD).**



**Appendix 3**  
**Inaccuracies in Joint Site Survey Report Appendix B, Atkins May 2010**

**Inconsistencies of Location of the Chitterne Site:**

p.61 'The site is located 1.5 km East of Chitterne village'.

p.632 B4.9.1'.....1km west of the village of Chitterne'.

p.633 'The site lies c. 2km to the west of the Chitterne Conservation Area'.

p.639 'Greenfield site located to the south west of the village of Chitterne on the B390.....'

p. 639 B4.9.5 'The site is located north of the B390 and approx 6km east of Chitterne Village.'

p.644 '.....over 2km from the nearest settlement (Chitterne).

